

1 Shannon L. Santos, SBN 260112
2 Email: Shannon.Santos@wilsonelser.com
3 **WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP**
4 555 South Flower Street, Suite 2900
5 Los Angeles, CA 90071-2407
6 Telephone: 213.443.5100
7 Facsimile: 213.443.5101

8 Michael J. O'Malley, Admitted *Pro Hac Vice*
9 Email: Michael.O'Malley@wilsonelser.com
10 **WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP**
11 55 West Monroe Street, Suite 3800
12 Chicago, IL 60603
13 Telephone: 312.704.0550
14 Facsimile: 312.704.1522

15 *Attorneys for Defendant CHA Health Systems, Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

18 A.P. and Y.Z.,

19 Plaintiffs,

20 vs.

21 CHA HEALTH SYSTEMS, INC.,
22 COMPREHENSIVE HEALTH FOR
23 ALL FERTILITY MEDICAL GROUP,
24 INC., D/B/A CHA FERTILITY
25 CENTER LOS ANGELES, CHA
26 FERTILITY CENTER LOS ANGELES,
27 JOSHUA J. BERGER, M.D., and
28 SIMON HONG, PH.D,

29 Defendants.

30 Case No.: 2:23-cv-01621-FLA-KES

31 **STIPULATION OF DISMISSAL
32 PURSUANT TO FRCP 41**

33 Hon. Fernando L. Aenlle-Rocha

1 **STIPULATION OF DISMISSAL PURSUANT TO FRCP 41**

2 Plaintiffs A.P. and Y.Z. and defendants CHA Health Systems, Inc.,
3 Comprehensive Health for All Fertility Medical Group, Inc., d/b/a CHA Fertility
4 Center Los Angeles, and Simon Hong, Ph.D. hereby stipulate under Federal Rule of
5 Civil Procedure 41(a)(1)(A)(ii) that this action be dismissed with prejudice as to all
6 claims, causes of action, and parties, with each party bearing that party's own
7 attorneys' fees and costs.

8 Respectfully submitted,

9
10 Dated: February 20, 2024

11 **WILSON ELSER MOSKOWITZ EDELMAN &**
12 **DICKER LLP**

13 By: /s/ Michael J. O'Malley

14 Michael J. O'Malley

15 Shannon L. Santos

16 *Attorneys for Defendant CHA Health
17 Systems, Inc.*

18 Dated: February 20, 2024

19 **FRIAR LEVITT, LLC**

20 By: /s/ Dae Y. Lee

21 Jonathan E. Levitt

22 Dae Y. Lee

23 *Attorneys for Plaintiffs A.P. and Y.Z.*

24 Dated: February 20, 2024

25 **FRASER WATSON & CROUTCH LLP**

26 By: /s/ Todd Croutch

27 Todd E. Croutch

28 Louise M. Douville

29 *Attorneys for Defendants Comprehensive
30 Health for All Fertility Medical Group, Inc.,
31 d/b/a CHA Fertility Center Los Angeles, and
32 Simon Hong, Ph.D.*